



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

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ATLANTA, GEORGIA 30303-8960

August 27, 2012

Townsend EIS Project Manager  
P.O. Box 180458  
Tallahassee, Florida 32318

SUBJECT: EIS for Proposed Modernization and Expansion of Townsend Bombing Range, Georgia.

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U. S. Marine Corps Draft Environmental Impact Statement (EIS) for the Proposed Modernization and Expansion of Townsend Bombing Range, Georgia. Under Section 309 of the CAA, EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

**Background:**

MCAS Beaufort, South Carolina, is home to Marine Aircraft Group (MAG)-31, which has six operational F/A-18 Hornet Squadrons. The F/A-18 is a fighter and attack jet aircraft that carries out air-to-air and air-to-ground missions from land bases and aircraft carriers. MAG-31 conducts anti-air-warfare and offensive air support operations in support of Fleet Marine Forces from advanced bases, expeditionary airfields, or aircraft carriers and conducts other air operations as directed.

Through the preparation of a Universal Need Statement (UNS; May 1, 2003), MAG-31 identified its requirement for an air-to-ground training range that allows aircrews to utilize PGMs in a realistic training environment. Following the preparation of the UNS, the USMC began the process to certify the requirement to establish an air-to-ground training range to support MAG-31's aviation training needs and develop the approach to accommodate this requirement. In 2009, the Marine Requirements Oversight Council (MROC) concurred with the concept to expand TBR. Thus, the MROC approved the requirement to establish an East Coast range capable of supporting PGM training and determined that modernization of TBR was critical to ensuring the effective training of East Coast-based USMC aviation units. The MROC's concurrence with MAG-31's need for an air-to-ground range that can accommodate realistic PGM training allowed the USMC and the DON to request the Department of Defense's (DOD's) approval to study the land acquisition alternatives that could support the creation of a modernized air-to-ground training range. The Office of the Secretary of Defense approved the request in December 2009. Based on these developments, the USMC initiated the preparation of the EIS to examine the potential impacts of the proposed land acquisition and airspace modification alternatives that could meet the training requirement.

To fulfill MAG-31's aviation training requirement to train with Precision Guided Missiles (PGM)s in a realistic training environment and achieve readiness proficiency for air-to-ground operations for MAG-31 F/A-18 pilots, the USMC proposes to modernize and expand TBR. This modernization and expansion of TBR would provide an enhanced, air-to-ground training range for MAG-31 F/A-18s that would safely accommodate the use of inert PGMs as well as the suite of inert

weapons that are currently used at TBR and thus achieve greater readiness proficiency for air-to-ground operations. Inert weapons contain no explosives, but may contain a small smoke charge (spotting charge) to assist in scoring the event and providing feedback to the pilot.

It is critical that TBR, as the primary air-to-ground range for MAG-31, has the capability to accommodate MAG-31's operational requirements, including training in the employment of PGMs, and the adaptability to accommodate evolving training needs and areas of emphasis. TBR is one of four air-to-ground ranges within the USMC's inventory on the East Coast and one of seven USMC ranges in the United States that support air combat/air-to-ground operations. TBR is centrally located between the Gulf Coast and the Eastern Seaboard and because of its strategic location is an ideal venue in support of military training requirements.

Munitions that are currently utilized for training at TBR are non-guided, inert weapons. Under TBR's present configuration, it is unable to meet all the requirements of the current F/A-18 air-to-ground training syllabus, including the delivery of PGMs; furthermore, no range within the local flying area is capable of supporting MAG-31's required level of PGM training.

### **Alternatives:**

EPA understands that this DEIS examined four action alternatives and the No Action Alternative. All four action alternatives would involve the acquisition and management of land and a timber easement, the modification of existing airspace, and the infrastructure to support PGM training, and would result in the improvement of training. During this process, the USMC developed four possible land acquisition areas. Acquisition Area 2, which was presented during the public scoping period, is not being carried forward for further analysis. Also, during preparation of this DEIS, Area 1, as it was presented during the public scoping period, was divided into two sections and renamed Areas 1A and 1B. The four alternatives with their respective acquisition areas are:

- Alternative 1: Acquisition Area 1A and Area 1B
- Alternative 2: Acquisition Area 3 (not analyzed)
- Alternative 3: Acquisition Area 1A, Area 1B, and Area 3
- Alternative 4: Acquisition Area 1B and Area 3

Based on the analysis presented in the DEIS, the USMC has selected Alternative 4 as the Preferred Alternative. Alternative 4 represents the most favorable balance of operational utility and acceptable environmental impacts. Both operational and environmental criteria were compared in order to identify Alternative 4 as the Preferred Alternative.

The Proposed Action includes acquisition of up to 36,828 acres within two areas (e.g., Acquisition Areas 1 and 3. A third Acquisition Area, Area 2, was originally considered as part of the Proposed Action, but was subsequently dropped from consideration due to, environmental sensitivity in Long and McIntosh Counties, Georgia, for the modernization and expansion of TBR. As part of the Proposed Action, up to eight Impact Areas, (IAs) would be placed within the two Acquisition Areas according to the DEIS, Attachment B, Figure 1-1. Within the eight IAs, target infrastructure and new roads would be constructed, and upgrades to existing roads would occur. Areas outside the IAs would serve as safety buffers.

## **EPA's Concerns:**

**Noise-** EPA is concerned about the noise level generated by strafing operation conducted at the scored strafing pits and by high angle strafing at the Targets Areas. Based upon the information developed by the US Army, a basic range of peak overpressure levels may generate complaints from people in the surrounding areas. For peak levels below 115 dBPk, no complaints are expected. For levels between 115 and 130 dBPk, some complaints may occur. For levels above 130 dBPk, complaints should be expected. Recommend further discussion in the Final EIS, on potential impacts to populations in Preferred Alternative, Figure 4-15 page 23 (Scoping Summary Report). Specifically discuss the population demographics and how notification will be handled to occasional sudden noise levels and ways to mitigate, thus minimizing noise exposure and complaints.

**Wetlands-** The wetland issue is appropriately addressed in this DEIS. However the Preferred Alternative, as well as the other alternatives would require the installation of target scoring equipment, facility and/or tower construction, and roadway construction/improvement that will have various impacts on area wetlands. The wetland Section 404 permitting process is the responsibility of the US Corps of Engineers with EPA's review. This project requires an Approved Jurisdictional Determination (JD) before the permitting process can begin. During that process the U. S. Marine Corps should continue to seek ways to reduce the impacts to wetland systems and any unavoidable impacts should be mitigated as a condition of issuing the permit for the project. Mitigation banks should be used to compensate for the loss of wetlands. EPA understands that two mitigation banks of 7,700 acres will be used to compensate for the loss of wetland functional values to both low and high quality wetlands.

In summary, EPA has environmental concerns regarding this project as stated above, and rates this draft EIS as "EC-2" ( i.e. environmental concerns with additional information requested in the final EIS). Our primary concern relates to the Preferred Alternative 4 and populations within and above the 130 dBPk noise level. We recommend continuing to seek ways to minimize the impacts to wetlands within the proposed project area. Please coordinate the permitting process with Region 4's Wetlands Regulatory Section.

Thank you for the opportunity to review and provided comments. If you wish to discuss this matter further, please contact Larry O. Gissentanna (404-562-8248 or [Gissentanna.larry@epa.gov](mailto:Gissentanna.larry@epa.gov)) of my staff.

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

Enclosures: Summary of Rating Definitions